

COPY

COMMUNITY RELATIONS PLAN
for a Superfund planned removal action
at LaSalle Electrical Utilities
in LaSalle (LaSalle Co.)

February 1, 1988

This community relations plan outlines activities to be conducted during a Superfund planned removal action at the residential areas in LaSalle near the Electrical Utilities site. Through a cooperative agreement with the U.S. Environmental Protection Agency, the Illinois Environmental Protection Agency will be responsible for conducting the community relations program. Technical contractors for community relations will not be hired. Telephone contacts, site visits, file information, public contacts and interviews were used to develop this plan. Flexibility has been built into this plan so adjustments can be made if unforeseen developments occur during the project.

A. BACKGROUND AND KEY ISSUES

1. History

The LaSalle Electrical Utilities site is located at 2427 St. Vincents Avenue on the northeast side of the City of LaSalle. The facility, which began operation in 1939, used polychlorinated biphenyls (PCB's) in the manufacture of capacitors. Oil containing PCB's was reportedly used for dust control on the site, and in some areas adjacent to the building, contaminated oil leaked or was spilled.

In December 1980, the Illinois Environmental Protection Agency (IEPA) inspected the LaSalle Electrical Utilities site in response to a dumping complaint. Two soil samples were taken and analyzed by the IEPA, and both samples showed evidence of PCB contamination. The IEPA returned to the site in February, 1981, and continued on-site soil sampling. Results of the soil sampling showed PCB contamination. On May 26, 1981, the site was sealed by IEPA. Shortly afterwards, company operations were moved to Farmville, North Carolina.

From May through September 1981, the IEPA took additional samples on and off the site and found PCB contamination. Relatively high concentrations were found in three areas: around the tanker where concentrations range from 102 to 17,000 parts per million (ppm); south of the building where concentrations in a small area range from 900 to 160,000 ppm; and in the northeast corner of the LaSalle Electrical Utilities property where concentrations reach 11,000 ppm.

Results of this sampling convinced the IEPA that this site should be included on a list of Illinois hazardous waste sites. This list, which identified 27 hazardous waste sites, was submitted to the USEPA for inclusion on the national Superfund list. If selected for inclusion on the Superfund list, the LaSalle site would be eligible for federal cleanup money.

In an effort to acquire more information about the site and determine if an emergency cleanup was needed, the USEPA coordinated additional sampling. Four groundwater monitoring wells were installed by USEPA in August 1982. One of the four wells showed minute concentrations of PCB's. PCB's were not detected in the other wells.

Soil and dust samples were taken from the site and adjacent property to determine if the contamination had spread to other areas. O & H Materials was contacted by USEPA to conduct this sampling. The laboratory analysis of these samples was sent to the IEPA in January, 1984, and indicate trace amounts of PCB's in dust samples taken inside the business building owned by the Uranich family. Higher concentrations of PCB's have not migrated any further. In addition, O & H Materials erected a fence around the site to keep children from playing and prevent scavengers from carrying away contaminated material.

The USEPA also contracted with Roy F. Weston Engineering to conduct soil sampling south and southeast of the site in December, 1983.

Concentrations in the surrounding areas are far lower than those measured on-site. In most areas, concentrations are less than 50 ppm. The highest off-site concentrations were measured in the truck parking and equipment storage area owned by Larry and Blanche Uranich.

Three separate legal actions have been initiated against LaSalle Electrical Utilities by regulatory agencies. In May 1982, the Attorney General, at the request of the IEPA, filed a complaint with the Circuit Court in LaSalle. The Attorney General also filed a similar complaint in federal court. LaSalle Electrical Utilities held an auction of miscellaneous moveable property at the site. IEPA attempted to enjoin the auction, but the injunction was denied.

In December, 1982, the USEPA released a proposed list of 418 hazardous waste sites eligible for Superfund money. This national list was chosen from lists submitted by the states. LaSalle Electrical Utilities was one of seven sites in Illinois selected for inclusion on the national list.

In March of 1984, the IEPA began the remedial investigation of this site. Access agreements were obtained from adjacent property owners for the installation of monitoring wells and soil sampling. Concurrently, the Illinois Department of Public Health contacted former employees of the Electrical Utilities Company to determine if there is any correlation between health problems and employment at EUC. A report was prepared by the IDPH which concluded that there were no correlations between adverse health effects and employment at EUC.

Analysis of soil samples detected the presence of polychlorinated biphenyls (PCBs) both on the EUC site and on adjacent property. This discovery was presented individually to the City Council, the LaSalle County States Attorney, and owners of affected property in personal meetings conducted by the IEPA community relations staff.

In April, 1985, 260 fifty-five gallon drums containing PCB contaminated oil and a storage tank containing solvents were identified in the EUC buildings. The solvent was removed from the site at no charge to the IEPA by an independent recycler. The contents of the drums were incinerated at the SCA Chemical Services Incinerator in Lake Calumet at a cost of \$116,600. Both of these removal actions were completed by January, 1986.

The Remedial Investigation Report prepared by Black and Veatch was completed and reviewed by IEPA and USEPA. A feasibility study to review and recommend a remedy for the off-site contamination was completed and a public hearing was held in July 1986 to discuss the selection process. Before the public hearing, IEPA community relations staff conducted small group meetings with selected interested citizens, city and county officials and local news media, to discuss proposed remedies. A fact sheet summarizing the proposed remedies and explaining how to submit comments was distributed three weeks before the hearing and made available at the LaSalle City Hall repository.

Following the F/S hearing held in July 1986, a responsiveness summary was prepared. This document summarized the testimony and comment given during the official comment period and at the hearing held in July. Verbal and written comments received during the public comment period supported the remedy preferred by IEPA. Copies of the summary were distributed to all interested parties by mail.

Ecology and Environment, the contractor selected to prepare plans and specifications, mobilized their mapping of the interiors and exteriors of zone A residences. Zone A is the area of residences bounded by St. Vincents Ave. on the west, Hennepin St. on the East, 24th Street on the South, and 27th Street to the North. Families that reside in this area will be relocated during yard excavation if the extent of individual yard excavation restricts access to residence. IEPA community relations staff assisted in this effort, and mapping of residences was completed in May of 1987.

A project bid conference was held in August 1987 in LaSalle. Prospective bidders attended the conference and explanations and interpretation of the specifications were the focal point of the meeting. Following the conference a summary of all questions and explanations were distributed to all prospective bidders.

A public meeting at which affected residents from zone A and zone B (residents who live along St. Vincents Ave. from 24th Street south of 11th Street, from 27th Street north to LaSalle Rd. and along Joliet Street from 11th Street to 7th Street.) were invited to attend, was held in October 1987 at the Mattiessen Auditorium in LaSalle Illinois. The project scope of work and progress status were the major topics discussed at the meeting. Relocation of zone A residents was explained and excavation plans were described in detail for the affected residents.

Following the meeting, revised consent of entry agreements were prepared and mailed to 180 affected property owners. Relocation needs surveys for all residents to be relocated were sent to residents to determine if any special needs will arise during the relocation effort.

Public Notification for a formal hearing regarding the EUC property RI/FS and subsequent remedial alternative selection was drafted and placed in the LaSalle News Tribune. An interview with Fran Brolley, a reporter for the News Tribune, was given to facilitate an in-depth article regarding the project and upcoming hearing. Copies of the article, fact sheet, and advertisement were sent to the public information repository at the LaSalle City Hall for public viewing.

The bid advertisement and bid invitations were prepared for the contract for hotel/motel procurement regarding the relocation of residents in zone A, during excavation at their properties. The ads were placed in local papers, MBE/WBE/SBE papers and the State official paper. Selection of a motel vendor should be completed by March of 1988 since the contract for off-site zone A and zone B excavation was awarded in January '88.

2. Key Issues and Current Concerns

- a. Safety of vegetables from nearby gardens -- Concern has been expressed by several area residents about the presence of PCB's in soil from their gardens. Although concentrations of PCB's measured in home gardens are negligible and appear to pose no threat, IEPA must cite the concentrations measured and explain how PCB's migrate through soil and affect food crops.
- b. Threat to human health -- Adjacent property owners want to know if PCB's either on-site or off-site, will adversely affect human health. Questions have been raised about contact with PCB's through breathing and touch. The Uranich family asked about the use of gloves, masks, and boots for protection. With three commercial establishments located on the south side of the site, the customers as well as the owners need accurate information about health effects if rumors and misperceptions are to be avoided. The use of "outside" experts and exchange of information with the news media will be needed to respond to these concerns.
- c. Effect on business -- Publicity about the existence of a hazardous waste site next to three commercial establishments may affect business. IEPA personnel must extend the same courtesy to customers of these establishments as to the owners. Every effort must be taken to prevent overblown news coverage, and the IEPA must remain sensitive to the business climate of the area.
- d. Cultivation of Dooley's field -- A small portion of a farm field on the north side of the site has low levels of PCB contamination. As a safety precaution, the Dooleys agreed not to harvest part of this field nearest to the site in 1983. Future plans for this field were discussed with the Dooleys before the 1984 planting season.
- e. Explanation of sample results -- Soil and dust sampling by O & H Materials has nearby residents curious as to the results. Sampling results not reported or explained in a manner understandable to residents sharply raises concern, fear, and can undermine the credibility of previous public statements about the site.

Residents should be notified of intentions and dates of future sampling. When access to private property is needed, an appropriate request should be made. IEPA must report sample results and explain their significance. If a backlog occurs at the laboratory conducting the analysis, a phone call to residents explaining the reason for delay may prevent anxiety.

- f. Traffic disruptions during construction -- Coordination is needed with city, county and state law enforcement agencies and the construction contractors to develop a safety training plan to minimize impacts on local traffic and traffic through town on St. Vincents and Joliet Street which are parts of state route 351.
- g. Possibility of increased health hazards during excavation -- Residents should be informed of safety measures being taken during the excavation, transportation, storage and incineration of PCB contaminated soils. Their health and safety concerns should be thoroughly addressed and informational meetings should be held well in advance of excavation.
- h. Relocation of residents during construction -- During yard excavation of homes across the street from the LaSalle Electric Site, it will be necessary to temporarily relocate household members. Extreme care must be taken to explain exactly where they will go, what will be done, how long they will be gone, what type of security will be provided and what condition their property will be left in. Thorough survey work must be completed this fall to determine special living and dietary needs for household members. Members of the IEPA staff will be at the motel chose for relocation purposes, to help with questions or needs of the residents during their stay away from home.
- i. Additional areas of excavation -- Additional areas of excavation have been identified during the remedial investigation survey work and notification of affected property owners and resident's should be completed this fall. Consent of entry authorizations will be distributed to responsible parties in September. This will allow time to resolve disagreements and address the concerns of the affected parties before excavation begins.
- j. Property values -- This can be a very emotional issue. Property values are affected by many factors. Removal of contaminated soils and the restoration of soils and landscaping should enhance property values, not lower them.
- k. Disruption of business trade during excavation -- work plans will be prepared through coordination of the LaSalle Public Works Department, Illinois Department of Transportation, IEPA, LaSalle Police and business owners, to minimize adverse impacts on businesses during the project period.
- l. Safety of residents, Lincoln Junior High School pupils and users of Hegler Park -- Site Safety and workplan preparation will address the safety of students, through work stoppages during commuting periods and education of children to avoid areas of construction. Additional safety measures may be identified and adopted by the contractor as the project schedule is finalized.

- m. Restoration of properties after excavation -- Carefull and detailed documentation of vegetation and structures on residents properties and agreement prior to excavation by the property owner will ensure satisfactory restoration will be accomplished by the contractor. Contacts with individual owners will identify sensitive areas and details that may need special attention.
- n. Noise during construction and incineration -- Since many residences are located very close to areas of excavation and also the proposed site for the Thermal Destruction Unit (TDU), noise pollution abatement is a prime concern of both residents and the IEPA and USEPA. Very strict limits on noise levels in and around the project site have been set. As the project progresses, the community relations staff will constantly monitor public reaction and work to avert needless confrontations between the contractor and the residents.

B. OBJECTIVES OF THE COMMUNITY RELATIONS PROGRAM

1. Inform the Dooleys, Uranichs, nearby property owners, operators of commercial establishments, and other interested citizens about plans, progress, and problems.
2. Insure that Alderman Hayden, Mayor Brady and other local, state, and federal officials who have an interest in the site are informed of plans, progress, and problems.
3. Identify key issues, changing concerns, and hidden assumptions in the community.
4. Provide accurate and timely information to the news media.
5. Prevent the development of unrealistic expectations.
6. Respond to all inquiries about this project in a complete and timely manner. Coordinate the release of all public information with the project manager and on-site coordinator.
7. Provide assistance for residents temporarily relocated from the residence during excavation.

C. COMMUNITY RELATIONS TECHNIQUES

The following techniques will be used to meet the objectives of this community relations plan.

<u>Technique</u>	<u>Objective</u>
1. Meetings, letters/phone calls, and interviews with adjacent property owners, local officials and other interested parties	To detemine citizen interest and keep people informed of plans and developments on a continuing basis.

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| 2. News releases/phone calls
(small group consultants
may be used to supplement
this technique) | To announce important developments
and summarize progress. Phone
calls will be used to inform key
residents and official before
major news releases are distributed |
| 3. Local repository (such as
a library or municipal building
for site related information) | To establish a readily available
source of documented information
about the site. |
| 4. Fact Sheets
a. Description of process
(remedial investigation
and feasibility study)
b. Recommended alternatives | Explanation of single issue
using concise, simply stated
facts. To be distributed
to the press and at meetings
as a source of accurate information. |
| 5. Public consultations
(may be conducted at any time
during this phase, pre-planned
as well as impromptu) | Informal discussions with small
groups of concerned citizens to
review issues and answer questions. |
| 6. Public Meetings | Formal, open-to-the-community gathering
to discuss or announce major development
about the site. |
| 7. Status Reports | A summary of public inquiries,
response, and all community relations
activities conducted. |

D. WORKPLAN AND SCHEDULE

Some community relations activities were started before a cooperative agreement was reached. From November 1983 to February 1984, the following activities were completed: Community Impact Assessment, mailing list, interviews with local officials, adjacent property owners and other interested groups, and a public meeting to discuss the cleanup process.

Other planned activities are listed below. The time schedule begins with the signing of the cooperative agreement.

Activity	Aug	Sept	Oct	Nov	Dec	Jan	Feb	March	Apr	May	June
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Letters/phone calls to local officials, news media adjacent property owners and other interested parties					On Going						
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News Releases				A		B/E	C	D			
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Fact Sheet						A/C			B		
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Community Relations Plan							A				
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Public Meetings			A	B		C	D/E				
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Consent of Entry Forms		A									
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Relocation Needs Survey		A									
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Public Consultation Maintain			On Going								
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Information repository			On Going								
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Bid for Motel							A				
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Property Owners Survey		A									
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Resident Temporary Relations								A-----			
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ACTIVITY/DESCRIPTION

Letters, Phone Calls, and Informal Meetings with Citizens, News Media, and Local Officials Ongoing -- Dialog initiated by the IEPA to keep everyone informed during the construction phase of the project.

News Releases

- A. Announce bid conference
- B. Announce bid award
- C. Announce start of construction
- D. Announce construction of on site mobile incinerator
- E. Announce F/S hearing for on-site remedial action

Fact Sheet

- A. Distribute fact sheet about relocation arrangements
- B. Distribute fact sheet on incineration
- C. Distribute fact sheet on R/I F/S for on-site remediation

Community Relations

Plan

- A. Prepare community relations plan for construction phase of project.

Public Meetings

- A. Meet with families to be relocated during construction
- B. Meet with city officials and residents to discuss excavation along St. Vincents Ave. and Joliet St.
- C. Meet with city and public to discuss excavation of residential yards.
- D. Pre-construction conference for off-site project.
- E. F/S hearing for on-site.

Consent of Entry Forms

- A. Distribute consent form for property owners affected by excavation efforts.
- B. Finalize all consent forms.

Relocation Needs Survey

- A. Distribute survey form for temporary relocation effort to determine needs of household members and room requirements.

Bid for Motel

- A. Send out bids for motel selection need survey will help determine needs pertinent to motel selection.

Property Owner Survey

- A. Complete survey of property owners along St. Vincents Ave. and Joliet Street.

Resident Relocation

- A. Agency staff will stay in LaSalle during the relocation effort to assist in the smooth transition from homes to motel and to address any personal needs of the residents.

E. BUDGET AND STAFFING PLAN

<u>Activity</u>	<u>Staff Responsibility</u>	<u>Workhours</u>
Update Mailing List:	Greg Michaud Virginia Wood Bob Rosen	12-16
News Releases:	Greg Michaud Virginia Wood Bob Rosen	6-10 (per release)
Letters/Phone Calls	Greg Michaud Virginia Wood Bob Rosen	50-60
Fact Sheet	Greg Michaud Virginia Wood Bob Rosen	30-50 (per sheet)
Public Consultations	Greg Michaud Virginia Wood Bob Rosen Stan Black	75-95 per consultation
Update Community Relations Plan	Greg Michaud Virginia Wood Bob Rosen	40-60
Public Meetings	Greg Michaud Virginia Wood Bob Rosen Stan Black (Back-up)	80-120

<u>Activity</u>	<u>Staff Responsibility</u>	<u>Workhours</u>
Prepare Access Consent Forms	Greg Michaud Virginia Wood Bob Rosen Stan Black (Back-up)	18-25
Conduct Owner Survey (St.Vincent)	Bob Rosen Stan Black	60-80
Prepare Relocation Needs Survey	Greg Michaud Virginia Wood Bob Rosen Stan Black	40-60
Secure Access Agreements	Virginia Wood Bob Rosen Stan Black	100-125
Hotel Relocation Bio Survey	Greg Michaud Virginia Wood Bob Rosen Stan Black	25-30
Maintain Information Repository	Virginia Wood Bob Rosen	5-6
Support Relocation Effort	Greg Michaud Virginia Wood Bob Rosen Stan Black (Back-Up)	1000 - 1200

APPENDIX I: INTERESTED CITIZENS AND OFFICIALS

Officials

Ruth Spayer, Director of Park District, City of LaSalle, City Hall LaSalle, IL 61301

Roger Sines, Director of Public Works, City of LaSalle, City Hall, LaSalle, IL 61301

Fran Baratta, City Clerk, City of LaSalle, City Hall, LaSalle, IL 61301

Gail Heller, Alderman, City of LaSalle, 843 7th Street, LaSalle, Illinois 61301 (815/223-7702)

Jeff Hayden, Alderman, City of LaSalle, 1252 Linden Street, LaSalle, Illinois 61301 (815/223-3561) Work (223-0626) Extension 261)

James Brady, Mayor, city of LaSalle, (Village Hall -- 745 Second Street), LaSalle, Illinois 61301 Work (223-3755)

Peg McDonnell Breslin, Illinois State Representative, 105 W. Madison, Ottawa, Illinois 61550

Patrick D. Welch, Illinois State Senator, 1412 Buffalo Street, Peru, Illinois 61354

Richard A. Mautino, Illinois State Representative, 330 West Dakota Street, Spring Valley, Illinois 61362

Mr. Gerald Johnson, Chairman LaSalle County Board, 707 Etna Road, Ottawa, Illinois 61350 (815/434-8242)

Joe Panzica, Member, LaSalle County Board, 540 Fifth Street, LaSalle, Illinois 61301

LaSalle County Clerk, 707 Etna Road, Ottawa, Illinois 61301-0430 (815/434-8202)

Gary L. Peterlin, States Attorney, LaSalle County, LaSalle County Courthouse, 707 Etna Road, Ottawa, Illinois 61350-0430 (815/434-8208)

Dennis Hastert, U.S. Representative, 14th Congressional District, Room 515 Cannon St., Washington, D.C. 20515 District Office, 115 Campbell, Suite 101, Geneva, Illinois

News Media

Mike Cunniff, the Daily Times, 110 West Jefferson Street, Ottawa, Illinois 61350 (815/433-2000)

Fran Brolley, News-Tribune, 426 Second Street, LaSalle, Illinois 61301 (815/223-3200)

David Silverberg, News-Tribune (Princeton Office), 101 Park Avenue East,
Princeton, Illinois (815/875-3821)

WLPO (AM), Box 215, LaSalle, Illinois 61301 (815/223-3100)

WCMY (AM), 216 W. Lafayette, Ottawa, Illinois (815/434-6050)

Jim Kerrigan, Peoria Journal Star, 1 News Plaza, Peoria, Illinois 61643
(309/686-3000)

Charlie Schlenker, WLRZ, 3905 Progress Blvd. Peru, Il. 61354 (815/224-2100)

Eric Ober, News Director, WBBM-TV, 630 N. McClurg Court, Chicago, Illinois
60611 (312/944-6000)

Jeff Hawkinson, News Director, WEEK-TV, 2907 Springfield Road, Peoria,
Illinois 61611 (309/699-3961)

Duane Wallace, News Director, WMBD-TV, 3131 N. University Street, Peoria,
Illinois 61604 (309/688-3131)

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